

Exhibit 3

From: Adron Beene [mailto:adron@adronlaw.com]
Sent: Monday, March 30, 2020 3:58 PM
To: Jeffrey M. Ratinoff <jratinoff@hopkinscarley.com>; John Pernick <jpernick@be-law.com>
Cc: John V. Picone III <jpicon@hopkinscarley.com>; Cary Chien <cchien@hopkinscarley.com>; Adron Jr. <adronjr@adronlaw.com>
Subject: Re: 18cv07182 Neo4j, Inc. v PureThink AND 19cv06226EJD Neo4j, Inc. v Graph Foundation, Inc.

Jeffrey,

Here are my redlines. Mr. Pernick has given his OK to these.

We probably should do one filing on the dispute to keep the chatter down. We will work on ours and send it to you.

I think the stip mentioned separate filings so that should be fixed.

Adron W. Beene
Attorney at Law
7960 Soquel Drive
Ste B #296
Aptos CA 95003
(408) 392-9233



This email, if sent to a client, is confidential. No tax or securities advice is provided or may be relied on.

From: "Jeffrey M. Ratinoff" <jratinoff@hopkinscarley.com>
Date: Monday, March 30, 2020 at 12:00 PM
To: Adron Beene <adron@adronlaw.com>, John Pernick <jpernick@be-law.com>
Cc: "John V. Picone III" <jpicon@hopkinscarley.com>, Cary Chien <cchien@hopkinscarley.com>, Adronjr Beene <adronjr@adronlaw.com>
Subject: FW: 18cv07182 Neo4j, Inc. v PureThink AND 19cv06226EJD Neo4j, Inc. v Graph Foundation, Inc.

Gentlemen,

Based on the Court's request, I've prepared the attached stipulation. I tried coming up with reduced page limits, but thought it made more sense to consolidate briefs since there will be a lot of identical legal and facts arguments in the two cases. I also tried to come up with a balanced schedule that seeks to have the motions heard before Christmas.

As for the dispute over the unclean hands issue. Do you want to submit a joint statement with our respective position similar to a cmc statement? If so, what are you thinking timing-wise?

Thanks,
Jeff

From: Adriana Kratzmann <Adriana_Kratzmann@cand.uscourts.gov>
Sent: Saturday, March 28, 2020 3:46 PM
To: Jeffrey M. Ratinoff <jratinoff@hopkinscarley.com>; 'adronjr@adronlaw.com'
<adronjr@adronlaw.com>; 'adron@adronlaw.com' <adron@adronlaw.com>; Cary Chien
<cchien@hopkinscarley.com>; Gloria Cordova <gcordova@hopkinscarley.com>; John V. Picone III
<jpicone@hopkinscarley.com>; Diana L. Hodges <dhodges@hopkinscarley.com>; Diana L. Hodges
<dhodges@hopkinscarley.com>; 'veronica.ramirez@neotechnology.com'
<veronica.ramirez@neotechnology.com>; 'John Pernick' <jpernick@be-law.com>
Subject: RE: 18cv07182 Neo4j, Inc. v PureThink AND 19cv06226EJD Neo4j, Inc. v Graph Foundation, Inc.

Good afternoon,

Please submit the agreed proposed schedule and then the separate statements to the Court re this matter. Thank you.

From: Adriana Kratzmann
Sent: Monday, March 23, 2020 3:16 PM
To: 'Jeffrey M. Ratinoff' <jratinoff@hopkinscarley.com>; adronjr@adronlaw.com;
adron@adronlaw.com; Cary Chien <cchien@hopkinscarley.com>; Gloria Cordova
<gcordova@hopkinscarley.com>; John V. Picone III <jpicone@hopkinscarley.com>; Diana L. Hodges
<dhodges@hopkinscarley.com>; Diana L. Hodges <dhodges@hopkinscarley.com>;
veronica.ramirez@neotechnology.com; John Pernick <jpernick@be-law.com>
Subject: RE: 18cv07182 Neo4j, Inc. v PureThink AND 19cv06226EJD Neo4j, Inc. v Graph Foundation, Inc.

Good afternoon,

Thank you Counsel for the email. I will check with chambers and let you know how the Court wishes to proceed on this issue.

Best regards,

Due to the on-going health threat caused by COVID-19 and Pursuant to General Orders 72 and 73 the Courthouse will be closed to the public until May 1, 2020.



Adriana M. Kratzmann

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United States District Court
Northern District of California
San Jose Division
280 South First Street, Rm 2112
San Jose, CA 95113
adriana_kratzmann@cand.uscourts.gov
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From: Jeffrey M. Ratinoff <iratinoff@hopkinscarley.com>

Sent: Monday, March 23, 2020 2:56 PM

To: Adriana Kratzmann <Adriana_Kratzmann@cand.uscourts.gov>; adronjr@adronlaw.com; adron@adronlaw.com; Cary Chien <cchien@hopkinscarley.com>; Gloria Cordova <gcordova@hopkinscarley.com>; John V. Picone III <jpicone@hopkinscarley.com>; Diana L. Hodges <dhodges@hopkinscarley.com>; Diana L. Hodges <dhodges@hopkinscarley.com>; veronica.ramirez@neotechnology.com; John Pernick <jpernick@be-law.com>

Subject: RE: 18cv07182 Neo4j, Inc. v PureThink AND 19cv06226EJD Neo4j, Inc. v Graph Foundation, Inc.

Hi Adriana,

The parties are in general agreement as to the claims and counterclaims that would be heard in first phase of summary judgment/adjudication. However, they have reached an impasse as to whether one of Defendants' affirmative defenses should be addressed in the first phase or the second phase. Should we submit a stipulation as to what has been agreed to and a proposed schedule, and then a separate joint statement outlining this dispute for the court's consideration? Thank you in advance for your patience and assistance with this matter.

Respectfully submitted,
Jeffrey Ratinoff

From: Adriana Kratzmann <Adriana_Kratzmann@cand.uscourts.gov>

Sent: Saturday, March 21, 2020 3:00 PM

To: Jeffrey M. Ratinoff <iratinoff@hopkinscarley.com>; adronjr@adronlaw.com; adron@adronlaw.com; Cary Chien <cchien@hopkinscarley.com>; Gloria Cordova <gcordova@hopkinscarley.com>; John V.

Picone III <jpicone@hopkinscarley.com>; Diana L. Hodges <dhodges@hopkinscarley.com>; Diana L. Hodges <dhodges@hopkinscarley.com>; veronica.ramirez@neotechnology.com

Cc: Adriana Kratzmann <Adriana_Kratzmann@cand.uscourts.gov>

Subject: RE: 18cv07182 Neo4j, Inc. v PureThink AND 19cv06226EJD Neo4j, Inc. v Graph Foundation, Inc.

Importance: High

Good afternoon Counsel,

The Court makes inquiry as to the status of the filing of the proposed schedule for this matter. Please advise at your earliest convenience. Thank you.

Best regards,

Adriana M. Kratzmann

Courtroom Deputy to Honorable Edward J. Davila

United States District Court

Northern District of California

San Jose Division

280 South First Street, Rm 2112

San Jose, CA 95113

adriana_kratzmann@cand.uscourts.gov

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Direct Dial: (408) 535-5356



From: Adriana Kratzmann

Sent: Monday, March 16, 2020 4:31 PM

To: 'Jeffrey M. Ratinoff' <iratinoff@hopkinscarley.com>; adronjr@adronlaw.com; adron@adronlaw.com; Cary Chien <cchien@hopkinscarley.com>; Gloria Cordova <gcordova@hopkinscarley.com>; John V. Picone III <jpicone@hopkinscarley.com>; Diana L. Hodges <dhodges@hopkinscarley.com>; Diana L. Hodges <dhodges@hopkinscarley.com>; veronica.ramirez@neotechnology.com

Subject: RE: 18cv07182 Neo4j, Inc. v PureThink AND 19cv06226EJD Neo4j, Inc. v Graph Foundation, Inc.

Thank you Counsel for the response and status of when the Court can anticipate the proposed schedule.

Best regards,

From: Jeffrey M. Ratinoff <iratinoff@hopkinscarley.com>

Sent: Monday, March 16, 2020 2:43 PM

To: Adriana Kratzmann <Adriana_Kratzmann@cand.uscourts.gov>; adronjr@adronlaw.com; adron@adronlaw.com; Cary Chien <cchien@hopkinscarley.com>; Gloria Cordova <gcordova@hopkinscarley.com>; John V. Picone III <jpicone@hopkinscarley.com>; Diana L. Hodges <dhodges@hopkinscarley.com>; Diana L. Hodges <dhodges@hopkinscarley.com>; veronica.ramirez@neotechnology.com

Subject: RE: 18cv07182 Neo4j, Inc. v PureThink AND 19cv06226EJD Neo4j, Inc. v Graph Foundation, Inc.

Hi Adriana,

We apologize for the delay, which has been due, in part, to the current COVID-19 crisis. We are current in the process of hammering out a few points of disagreement and will hopefully having a proposed schedule on file by the end of this week.

Sincerely,
Jeffrey Ratinoff

From: Adriana Kratzmann <Adriana_Kratzmann@cand.uscourts.gov>
Sent: Thursday, March 12, 2020 5:03 PM
To: adronjr@adronlaw.com; adron@adronlaw.com; Cary Chien <cchien@hopkinscarley.com>; Gloria Cordova <gcordova@hopkinscarley.com>; John V. Picone III <jpicone@hopkinscarley.com>; Diana L. Hodges <dhodges@hopkinscarley.com>; Jeffrey M. Ratinoff <jratinoff@hopkinscarley.com>; Diana L. Hodges <dhodges@hopkinscarley.com>; veronica.ramirez@neotechnology.com
Cc: Adriana Kratzmann <Adriana_Kratzmann@cand.uscourts.gov>
Subject: 18cv07182 Neo4j, Inc. v PureThink AND 19cv06226EJD Neo4j, Inc. v Graph Foundation, Inc.
Importance: High

Good afternoon Counsel,

Pursuant to the Further Case Management Conference held on 3/5/2020, the parties were to meet and confer and submit a proposed order re schedule and trial date to the Court. Please file this at your earliest convenience. Thank you.

Notice of Electronic Filing

The following transaction was entered on 3/5/2020 at 11:38 AM PST and filed on 3/5/2020

Case Name: Neo4j, Inc. v. PureThink, LLC et al

Case Number: [5:18-cv-07182-EJD](#)

Filer:

Document Number: 66(No document attached)

Minute Entry for proceedings held before Judge Edward J. Davila: Further Case Management Conference held on 3/5/2020. The parties shall meet and confer re an agreed upon schedule and trial date and submit the proposed order to the Court for approval. The Court vacates previous deadlines/hearing dates. The Court will allow 2 summary judgment motions and if possible pleadings shall have the page limit indicated by the Court. Deadline for Defendants to respond to settlement proposal from mediation shall be due 3/17/2020. Should a further settlement conference be necessary the parties agreed to have a settlement conference with the assigned Magistrate Judge van Keulen and shall contact her chambers directly to schedule. Plaintiff Attorney: Jeffrey Ratinoff, John Picone.

Defendant Attorney: Adron Beene, John Pernick. Total Time in Court:10:42-10:57am(15 Mins.) Court Reporter: Lee-Anne Shortridge. (This is a text-only entry generated by the court. There is no document associated with this entry.) (amkS, COURT STAFF) (Date Filed: 3/5/2020)

Case Name: Neo4j, Inc. v. Graph Foundation, Inc.
Case Number: [5:19-cv-06226-EJD](#)
Filer:
Document Number: 41(No document attached)

Minute Entry for proceedings held before Judge Edward J. Davila: Further Case Management Conference held on 3/5/2020. The parties shall meet and confer re an agreed upon schedule and trial date and submit the proposed order to the Court for approval. The Court vacates previous deadlines/hearing dates. The Court will allow 2 summary judgment motions and if possible pleadings shall have the page limit indicated by the Court. Deadline for Defendants to respond to settlement proposal from mediation shall be due 3/17/2020. Should a further settlement conference be necessary the parties agreed to have a settlement conference with the assigned Magistrate Judge van Keulen and shall contact her chambers directly to schedule. Plaintiff Attorney: Jeffrey Ratinoff, John Picone. Defendant Attorney: Adron Beene, John Pernick. Total Time in Court:10:42-10:57am(15 Mins.) Court Reporter: Lee-Anne Shortridge. (This is a text-only entry generated by the court. There is no document associated with this entry.) (amkS, COURT STAFF) (Date Filed: 3/5/2020)

Adriana M. Kratzmann

Courtroom Deputy to Honorable Edward J. Davila
United States District Court



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